

March 16, 2001

Mary L. Cottrell, Secretary

Department of Telecommunications and Energy

One South Station

Boston, MA 02110

RE: D.T.E. 01-28

Advanced Metering Model Tariffs

Dear Secretary Cottrell:

Enclosed for filing please find an original and five copies of the Massachusetts Division of Energy Resources (DOER) request for a two-week extension to the comment period in the above referenced proceeding.

Thank you for your attention in this matter. If you have any questions or need additional information please feel free to contact me at (617) 727-4732 x-132.

Sincerely,

Matthew T. Morais

DOER Legal Counsel

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I, Matthew T. Morais, certify that I have served a copy of the DOER request for a two-week extension to the comment period in D.T.E. 01-28, contained herein, on each individual on the service list in D.T.E. 01-28 on file with the Department of Telecommunications and Energy.

Dated at Boston, Massachusetts, this 16th day of March, 2001.

Matthew T. Morais

Legal Counsel

DOER

70 Franklin Street, 7th Floor

Boston, MA 02110-1313

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RE: ADVANCED METERING)

ELECTRIC MODEL TARIFFS) DTE 01-28

MOTION OF THE MASSACHUSETTS
DIVISION OF ENERGY RESOURCES, THE ASSOCIATED INDUSTRIES OF
MASSACHUSETTS, AND THE ENERGY CONSORTIUM REQUESTING AN
EXTENSION TO THE INITIAL COMMENT PERIOD

I.

The Massachusetts Division of Energy Resources (DOER), the Associated Industries of Massachusetts (AIM), and The Energy Consortium (TEC) hereby move to request a two-week extension to the initial comment period in DTE 01-28 with respect to the filings of all the utility companies except Massachusetts Electric (MECo).⁽¹⁾ Granting of the request will change the initial comment period deadline for these filings from March 19, 2001 to April 3, 2001. The extension is requested for the reasons stated below.

II.

Based on the discussions held at the Department of Telecommunication and Energy's (DTE) Advanced Metering technical conference on March 1, 2001, the parties to this motion ("parties") understood that the utility companies agreed to the following in order to facilitate the review process:

- 1) The utilities would work in concert to submit a single model tariff filing with the only difference being the fees for the respective utilities;
- 2) The substance of the single filing would reflect the settlement of the Advanced Metering settlement entered into by the parties and Massachusetts Electric (MECo);
- 3) The parties would receive a draft of the model tariff prior to the filing at DTE;
- 4) The tariff would contain specific fees for the different Advanced Metering Services, and;
- 5) The cost data to support the proposed Advanced Metering Tariffs would be provided simultaneously with the proposed tariffs.

As described below, the utility companies did not meet the commitments listed above.

With respect to the first commitment, a single filing was not prepared by the companies. Each company submitted a separate filing.

Regarding the second commitment, with the exception of the MECo filing, the individual filings did not mirror the substance of the DOER/AIM/TEC-MECO Advanced Metering settlement. Although certain filings were similar, any differences result in an increase in the level and effort of review required to prepare initial comments.

Regarding the third commitment, the parties did not receive draft copies of the filings prior to the filing at DTE. Certain utility filings were not received by the DTE filing date, and to date, certain companies have not provided copies of their filings for review.⁽²⁾ At a minimum, all filings should have been received by the parties on the DTE filing date.

Regarding the fourth and fifth commitments, only two of the filings contained specific fees for the proposed Advanced Metering services, and none of the filings provided supporting cost data. The lack of this information prevents the parties from preparing and submitting complete comments that address all of the potential substantive issues associated with the proposed Advanced Metering Tariff filings.

III.

The commitments listed in Section II above were meant to facilitate the accomplishment of adequate review under the compressed schedule established at the technical conference. The utility companies did not meet the commitments. Therefore, the review and comment period is not adequate to prepare comments that sufficiently address all potential substantive issues associated with the advanced Metering Tariff filings (with the exception of the MECo filing). The parties agreed to the schedule based upon the expectation that the above commitments would be met. The fact that the commitments have not been met has resulted in an increase in the level of effort required to review the filings and prepare initial comments.

WHEREFORE, the parties respectfully request a two-week extension to the comment period for all the Advanced Metering Tariff filings except the MECo filing. The granting of the extension will allow for adequate review by agencies and organizations that represent the interest of the public at the residential, commercial and industrial levels, and is therefore in the public interest.

Respectfully submitted,

MASSACHUSETTS DIVISION OF
ENERGY RESOURCES

By: _____

Matthew T. Morais

Legal Counsel

Division of Energy Resources

70 Franklin Street, 7th Floor

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(617) 727-4732 x 132

Dated: March 16, 2001

1.

¹ MECo entered into a settlement with DOER, AIM, and TEC relative to Advanced Metering and Billing. Their Advanced Metering Filing submitted in this proceeding substantively mirrors the settlement agreement. Since the parties reviewed and agreed to the substance of the MECo filing in the settlement agreement, there is no need to extend the comment period with respect to the MECo filing. Regarding the MECo filing, the parties support said filing and urge the DTE to approve the filing. However, it should be noted that the parties support of the MECo filing is limited to the substantive issues described in the filing. The parties support a future proceeding to address unresolved issues related to Advanced Metering and reserve their rights to

fully participate in such a future proceeding with respect to all issues not contained in the MECo filing submitted in this proceeding. The parties intend to elaborate further on this topic in the initial comments.

2.

² The parties have not received filings from Boston Edison, Commonwealth Electric, or Fitchburg Gas & Electric (FG&E). It is noted that FG&E has not submitted an Advanced Metering Model Tariff to DTE and has filed a request for an extension of the filing deadline to March 17, 2001. With regard to Boston Edison and Commonwealth Electric, NSTAR has stated that although individual filings for these companies have not been prepared and filed, the filings for these companies would follow the same format as the Cambridge Electric filing.